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Via Email and Registered First Class Mail

November 22, 2013

Mr. Ravi Sanga
Remedial Project Manager
U. S. Environmental Protection Agency – Region 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

Re: Jorgensen Forge Outfall Site – CERCLA Docket No. 10-2011-0017

Dear Mr. Sanga:

Thank you for meeting with us last week to discuss the status of the referenced work. The purpose of that meeting, as you know, was to present new soil quality data acquired pursuant to the Second Modification to the Administrative Order on Consent for Removal Action for the Jorgensen Forge Outfall Site (JFOS Order). Those data, which were provided to you at the meeting and will be submitted in a forthcoming data report, indicate that significant PCB concentrations occur in the bank soils to an elevation of approximately -15 feet Mean Lower Low Water (MLLW) rather than approximately -5 feet MLLW, which was the best estimate prior to receipt of the new angle-boring data. The prospect of removing those soils to the lower elevation raises engineering questions related to the steel sheetpile (SSP) design for the shoring needed to excavate upland soils covered under the JFOS Order and bank soils westward of the SSP. Thus, we are respectfully requesting additional time to consider these results and re-evaluate certain aspects of the SSP design. Additional details regarding this request are provided below.

Review of the new soil quality data:

As required by the JFOS Order, borings were advanced into the Potential Additional Shoreline Bank Removal Area, as defined in Figure 1 attachment to the JFOS Order. Five borings were attempted, and one boring met with refusal. The other four were advanced to approximately -16 MLLW. A total of 29 soil samples were analyzed for PCBs. The results were provided at the

meeting and are attached for your convenience in advance of the data report submittal. Analytical results ranged between less than detection to 560 parts per million (ppm) based on dry mass of soil. Please note that, as discussed at the meeting, we are currently analyzing the organic carbon content of these samples so comparisons can be made to the Washington State Department of Ecology Sediment Management Standards (SMS) criteria. These analytical results will be included in the pending data report submittal.

Implications of the new data:

These new data confirm that PCB contamination exists to lower elevations than previously anticipated. As explained at the meeting, the new data, along with evidence in the boring logs, suggest that the fill/native soil contact separates the higher concentrations of PCB in fill soils from low to non-detect concentrations in native soils. However, the deeper high PCB concentrations were not considered in the current design of the early action sediment removal being conducted by EMJ (CERCLA Docket No. 10-2013-0032). In particular, the current design anticipates relatively shallow removal in this area (Sheet C-1 and C-2 of the approved design, see attached). In order to accomplish the much deeper excavation of bank soils, it will be necessary for the SSP and shoring in the upland area to be redesigned in order to ensure support of a greater cantilever load than previously estimated. This redesign must include careful consideration of the effect of water loading - both inside the sheetpile in the upland area and westward of the sheetpile, including the kinetic forces of tidal fluctuations. Since the existing design envisioned use of a very thick and long SSP product, which is available only on special order from Europe and with a lengthy lead time, a rigorous re-design before procurement of the SSP is essential.

Anticipated Schedule:

In connection with the SSP design and installation, we plan to work closely with the respondent conducting the early action sediment/bank removal. Based on the progress of the planning for the deeper bank remedy, the criteria for the SSP are expected by the middle of December, 2013. It is expected that a revised SSP design concept will be available by mid to late January, 2014. Following coordination of the revised SSP design with EPA and SSP suppliers, we would expect to order SSP by the end of January, 2014. Allowing eight weeks for delivery by ship through an east coast seaport, we can begin SSP installation early April, 2014, and allowing up to four weeks to install, the estimated completion will be May, 2014. We understand that this schedule will not in any way interfere with the EMJ early action area bank and sediment removal scheduled to commence late June or beginning of July, 2014.

Conclusion and request for schedule extension:

Based on the foregoing discussion, we respectfully request an extension for the completion of SSP installation by May 16, 2014, rather than the previously specified date for SSP installation of November 30, 2013. Please contact us if there are questions or if additional discussion is desired.

Sincerely,

William D Ernst, 2911

Digitally signed by William D Ernst, 2911
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Attachments: Summary of Soil Analytical Results
Sheet C-1, BODR – Jorgensen Forge Early Action Area
Sheet C-2, BODR – Jorgensen Forge Early Action Area

CC: Philip Spadaro, The Intelligence Group
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